

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DISTRICT**

JEREMY D. HARRISON

Plaintiff,

v.

CITY OF MONTGOMERY

Defendant.

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CASE NO. 2:22-CV-716-JTA

JOINT REPORT ON CONSOLIDATION

Come now counsel for the parties and, without waiving any responses or defenses available to be raised in a responsive pleading or motion, and for the limited purpose of responding to the Court's oral request for the parties' position on consolidation of this case with other pending cases, jointly report to the Court on the issues of consolidation for purposes of discovery and/or trial of the above-referenced cases and jointly show and represent as follows:

1. There are currently two other actions pending in the United States District Court for the Middle District of Alabama that arise out of the same factual scenario as the present case: *Marcus Webster v. City of Montgomery, et al.*, Case No. 2:21-cv-00641; and *Earl Stanley Ware v. City of Montgomery, Mayor Steven Reed, et al.*, Case No. 2:22-cv-00659.

2. At all material times, Plaintiffs in these three cases were employed by the City of Montgomery Police Department ("the City"). As a result of an internal investigation, they are alleged to have engaged in the same type of/similar misconduct that resulted in disciplinary action.

3. All three of the Plaintiffs in these cases are represented by the same counsel, Scott Morro. The City of Montgomery is the Defendant in these three cases and is also represented by the same counsel, Allison Ingram and Hope Hicks.

4. It is anticipated that there will be a large number of witnesses that will be the same in each case since the Plaintiffs claims all arise out of the same internal investigation, they worked under the same supervisor, and their discipline proceeded through the same administrative channels at the City. It is also anticipated that the written discovery will contain a large amount of the same material.

5. As a result, counsel for the parties jointly request that discovery in these three cases be consolidated. Because the amount of time and resources necessary for counsel for both sides to properly perform the factual discovery is sizeable, it will ultimately benefit the parties, counsel and the court if the cases are able to conduct discovery at the same time.

6. The parties do not request that the cases be consolidated for trial purposes. It is anticipated that there will be some factual differences such that separate trials will benefit the parties as well as any jury hearing the case.

7. The undersigned counsel has consulted with counsel for all parties and represents that she has the permission of all parties to file this joint motion.

Wherefore, premises considered, the parties respectfully request that the Court consolidate the three actions referenced herein for discovery purposes but not for trial.

Done this the 4th day of January, 2023.

/s/ Allison A. Ingram
ALLISON A. INGRAM (ALF005)
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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2023, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will provide a copy to the following:

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